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BY ECF AND EMAIL

June 21, 2023

Honorable Richard M. Berman
United States District Court
Southern District of New York
New York, New York 10007

Re: United States v. O'Mara, No. 23 Cr. 72 (RMB)

Dear Judge Berman:

We write on behalf of our client, Mark O'Mara, to respectfully request the Court's approval for Mr. O'Mara to travel to Sussex County, Delaware from June 28 through July 14, 2023. The Pretrial Services Officer supervising Mr. O'Mara and the Government both consent to this request. As Your Honor may recall, when the Court set bail conditions and associated travel restrictions for Mr. O'Mara at his guilty plea hearing before the Court on February 7, 2023, Mr. O'Mara previewed his plans to pursue this trip for the Court, and the Court indicated that it would have no objection. (*See* Plea Hr'g Tr. (Dkt. No. 8) at 34-35).

On February 7, 2023, Mr. O'Mara waived indictment and pleaded guilty before the Court to the charges contained in the above-referenced Information pursuant to a cooperation agreement with the Government, and he was subsequently released from custody pending his sentencing subject to bail conditions approved by the Court. Among other things, those bail conditions restrict Mr. O'Mara's travel to the Southern and Eastern Districts of New York, the District of New Jersey, the Middle District of Pennsylvania, and the Eastern, Middle, and Western Districts of Louisiana. In connection with the setting of his bail conditions at his plea, Mr. O'Mara previewed for the Court that he planned to seek approval for several anticipated trips—including this trip to Sussex County, Delaware—and the Court indicated that it would have no objection to such travel. (*See* Plea Hr'g Tr. (Dkt. No. 8) at 34-35).

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Mr. O'Mara would like to travel to Sussex County, Delaware from June 28 through July 14, 2023 for a family trip. He has been fully compliant with the conditions of his bail to date.

Accordingly, we respectfully request on behalf of Mr. O'Mara, with the consent of his Pretrial Services Officer and the Government, that the Court allow Mr. O'Mara to travel to Sussex County, Delaware from June 28 through July 14, 2023.

Respectfully submitted,

/s Samson A. Enzer
Samson A. Enzer
Nola B. Heller

cc: P.S.O. Christina Venable
A.U.S.A. Jane Kim
A.U.S.A. Catherine Ghosh

Application granted on consent.	
SO ORDERED:	
Date: 6/22/23	
	Richard M. Berman, U.S.D.J.